

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO.: 01:S12 10CRIM905-05

v.

JOSE BETANCOURT

Defendant.

DEFENDANT'S MOTION FOR ACCOUNTING AND RETURN OF PROPERTY SEIZED BY AUTHORITIES

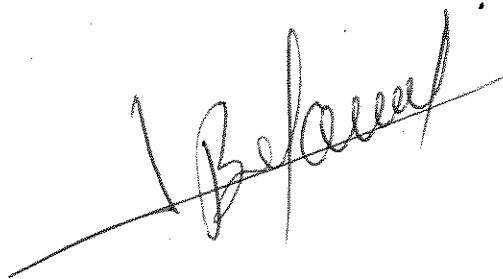
COMES NOW, Jose Betancourt, Defendant in the above styled case, and files this Motion seeking an accounting of property that was seized from him by the authorities during the pendency of his case, and requests that (1) the Government provide him with a list of items that they have that belong to him in his possession, (2) identify where these items are currently located and (3) that they return any items to him that are no longer relevant to his case, showing this Honorable Court the following:

1. The Defendant was sentenced on or about April 11, 2014 for violating the provisions of 21 U.S.C. 846 relating to conspiracy to distribute marijuana. Prior to the time he was sentenced, the Government seized property that belonged to the Defendant, including, but not limited to, an iPhone and 2 passports in his name. One was issued by the United States. The other by the Cuba.
2. The Defendant is an inmate at the Federal Prison Camp located in Pensacola, Florida. This is among the lowest level security institutions in the Federal Bureau of Prisons. The Defendant is not in a position to determine what items of personal property were seized by the Government nor does he has a list of those items. As a result, the Defendant seeks the help of the Court in determining what property is still being held by law enforcement officials.
3. The Defendant is seeking the return of any and all personal property that may still be in the possession of law enforcement officials and does not want any of the items to be forfeited. In this regard, to the best of the Defendant's knowledge and belief, he has never been served with any type of formal forfeiture or seizure paperwork.

WHEREFORE, the Defendant respectfully requests that this Court (1) enter an Order requiring law enforcement that was involved in his case to identify any and all property which they may have in their possession that relates to the Defendant, (2) that the Court inquire into the return of those items and, (3) for such other relief the Court deems appropriate under all of the circumstances.

Respectfully Submitted,

Jose Betancourt  
Federal Prison Camp  
Post Office Box 3949  
Pensacola, Florida 32516



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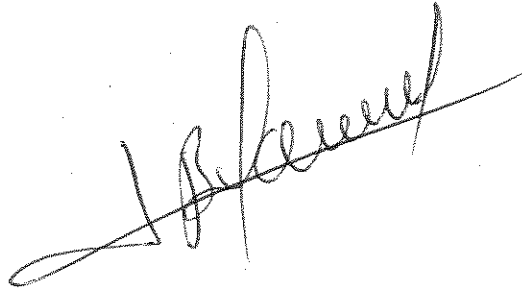
COMES NOW, Jose Betancourt, Defendant in the above styled case, and files this Motion seeking an accounting of property that was seized from him by the authorities during the pendency of his case, and requests that (1) the Government provide him with a list of items that they have that belong to him in his possession, (2) identify where these items are currently located and (3) that they return any items to him that are no longer relevant to his case, showing this Honorable Court the following:

1. The Defendant was sentenced on or about April 11, 2014 for violating the provisions of 21 U.S.C. 846 relating to conspiracy to distribute marijuana. Prior to the time he was sentenced, the Government seized property that belonged to the Defendant, including, but not limited to, an iPhone and 2 passports in his name. One was issued by the United States. The other by the Cuba.
2. The Defendant is an inmate at the Federal Prison Camp located in Pensacola, Florida. This is among the lowest level security institutions in the Federal Bureau of Prisons. The Defendant is not in a position to determine what items of personal property were seized by the Government nor does he has a list of those items. As a result, the Defendants seeks the help of the Court in determining what property is still being held by law enforcement officials.
3. The Defendant is seeking the return of any and all personal property that may still be in the possession of law enforcement officials and does not want any of the items to be forfeited. In this regard, to the best of the Defendant's knowledge and belief, he has never been served with any type of formal forfeiture or seizure paperwork.

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1. The Defendant was sentenced on or about April 11, 2014 for violating the provisions of 21 U.S.C. 846 relating to conspiracy to distribute marijuana. Prior to the time he was sentenced, the Government seized property that belonged to the Defendant, including, but not limited to, an iPhone and 2 passports in his name. One was issued by the United States. The other by the Cuba.
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WHEREFORE, the Defendant respectfully requests that this Court (1) enter an Order requiring law enforcement that was involved in his case to identify any and all property which they may have in their possession that relates to the Defendant, (2) that the Court inquire into the return of those items and, (3) for such other relief the Court deems appropriate under all of the circumstances.

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